

AUSA J. Basile
713-567-9393

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Court
Southern District of Texas
FILED

MAR - 1 2016

David J. Bradley, Clerk of Court

United States of America)

v.)

DEON BARNARD WOODS)

Case No.

H16-287 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 25, 2016 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18, USC, Section 922(g)(1)

Felon in Possession of Firearm

This criminal complaint is based on these facts:

see attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Roland Ballesteros, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

7-1-16

City and state:

Houston, Texas



Judge's signature

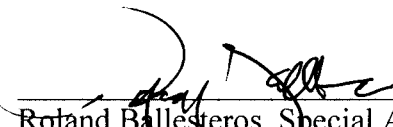
Mary Milloy, U.S. Magistrate Judge

Printed name and title

Affidavit of Roland Ballesteros

1. Your affiant, Roland Ballesteros, is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and has been so employed since August 1987. In my capacity as an agent, I have received extensive training in the identification and manufacture of firearms and I am also familiar with the Gun Control Act and I know that it is a violation of Title 18, United States Code, Section 922(g)(1) for any person who has been convicted of a crime punishable for a term exceeding one year to possess a firearm that has affected interstate commerce.
2. You affiant, being duly sworn, states the following to be true and correct to the best of his knowledge and belief based upon his personal observations and from information provided to him by knowledgeable law enforcement agents and officers who are involved in the investigation of Deon Barnard WOODS.
3. During the month of November 2015, your affiant received information from the Houston Police Department Narcotics Division that the criminal activities at 5602 Lakefield had resumed despite a February 2015 search warrant which resulted in the seizure of several firearms and the arrest of Alfred WOODS. Following the February 2015 search warrant, Alfred WOODS stated that his nephews also use the residence.
4. Since Alfred WOODS' incarceration on Federal charges, your affiant has learned from investigators involved in the investigation and from his own surveillance at 5602 Lakefield that Deon Barnard WOODS has assumed control of the residence along with his cousin Trevon WOODS. Your affiant has observed Deon Barnard WOODS unlock the cage entrance to 5602 Lakefield to enter the residence and lock it behind him when he leaves the residence in the morning and at all hours of the day.
5. Deon Barnard WOODS, aka: "D," is a black male, 5'8", 150 lbs., date of birth of 08/25/1994, Texas Driver License Number 34766269 and FBI# 441715MD6. In 2012, WOODS was arrested and charged with Aggravated Robbery, cause number 1371153 in the 232nd District Court of Harris County, Texas and pled guilty to the lesser charge of Theft from Person, a felony, and served 8 months in the Harris County Jail.
6. Your affiant has observed social media postings taken at 5602 Lakefield depicting numerous different firearms in the residence. Your affiant has observed Deon Barnard WOODS in these social media postings posing with these firearms to include a Draco assault pistol, a Mac-11 assault pistol, AR-15 rifles, an FN P90 assault rifle, plus several additional handguns.
7. On or about February 10, 2016, your affiant observed Deon Barnard WOODS arrive at 5602 Lakefield wearing a black pistol on his right hip and in open view. Your affiant observed Deon Barnard WOODS casually having a conversation with others in the front yard while the firearm was openly displayed. Your affiant observed Deon Barnard WOODS walk back and forth into the residence with the firearm.

8. Over the next several weeks, your affiant received additional information that Deon Barnard WOODS had been conducting drive-by shootings at a rival's house. The residence at 5602 Lakefield also has bullet holes, and investigators believe that they were likely in response to the drive-by shootings.
9. On February 25, 2016, your affiant served a Federal search warrant at 5602 Lakefield. Your affiant recovered a loaded Draco assault pistol, two loaded AR-15 assault rifles, ammunition of various pistol and rifle calibers, and pistol and rifle magazines to include a magazine for an FN P90 assault rifle - all similar to what appeared in Deon Barnard WOODS' social media postings from the residence. Your affiant also recovered three ballistic vests and spent bullet casings in both the front and back yards of the residence. Your affiant observed bullet holes throughout 5602 Lakefield as well as bullet holes in the neighboring residence and their vehicle. One neighbor approached you affiant and informed him that the neighborhood has been terrified of the violence at 5602 Lakefield noting two drive-by shootings in as many months.
10. Deon Barnard WOODS was not present at the residence during the execution of the search warrant. While conducting a search at the residence however, your affiant was advised on social media postings warning WOODS to not return to the residence, noting the presence of law enforcement. Your affiant believes that WOODS is currently in possession of several of the firearms depicted in photographs and previously posted on social media by Deon Barnard Woods that were not recovered by your affiant at the residence on February 25.
11. Your affiant is recognized as an expert in the interstate movement of firearms and knows that the firearms possessed by Deon Barnard WOODS were manufactured at various locations outside of the State of Texas and therefore have affected interstate or foreign commerce to arrive in the State of Texas.
12. Based on the foregoing, your affiant believes that Deon Barnard WOODS is in possession of firearms that have moved in or affected interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1). This violation occurred within Harris County, in the Southern District of Texas.



Roland Ballesteros, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Subscribed and sworn to in my presence, this 1st day of March 2016, and I find probable cause.



Mary Milloy
United States Magistrate Judge